

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Docket No. _____

United States of America

vs.

James T. Richards

IN CLERKS OFFICE
2005 NOV 21 P 3:46
U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO PRODUCE ALL DOCUMENTS

Now comes defendant in the above-entitled action and hereby requests that this Honorable Court order that the prosecution produce all documents in their possession which were sent by the defendant, or allegedly sent by the defendant, or which it believes were sent by the defendant, to any media organization, in the period from November, 2001 to January, 2002, inclusive, or which were sent to any other organization and which allegedly contain any threat or any information regarding the abuse of defendant's daughter.

As reason therefore, defendant states that said evidence is necessary for defendant's defense, and to establish his state of mind at the time of the offense that he is charged with committing.

Respectfully submitted,

James T. Richards
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Date: November 18, 2005